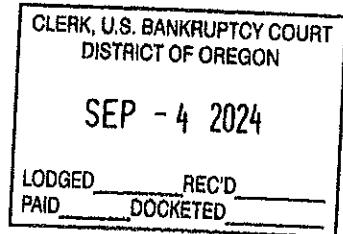


UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON



In re: Van's Aircraft, Inc., (Debtor)

Case No. 23-62260-dwh11

Claim No: 501

Claimant: Matthew Larson

BACKGROUND:

On June 12, 2021 I ordered from Van's Aircraft TWO quick build kits:

- one RV-14a Quickbuild Fuselage kit (\$15,712.08)
- one RV-14a Quickbuild Wing kit (\$14,782.28)

Total paid amount was \$30,494.36

The kits were both delivered in Spring of 2023 after a nearly two year wait. Upon delivery Van's agreed to a timeline where I could inventory my kit to verify receipt of paid for items. Upon inventory: I discovered I did not receive the "punched parts" and instead received bogus "Laser cut parts" that are not airworthy. I asked for a full refund for both QuickBuild kits. I sent Numerous emails and Facebook messenger texts to Greg Hughes COO of Van's aircraft.

Hoping to speak with someone from Van's I drove 5 hours to an airshow in Oshkosh, Wisconsin in the summer of 2023. I was able to first speak to Anne Bobbitt, after a long conversation, she said Van's would "do right by me" and "refund my money". I verified this with Greg Hughes, who I tracked down the next day. This refund promise from Van's Aircraft meets the tenets of contract law and as such, the money is owed and my claim should be reinstated over debtors objection.

Moreover and equally important to the aforementioned:

- QB kits with Laser cut parts (as both my kits have) are not able to meet certification by the FAA. Minneapolis FSDO (Flight standards district office) said it was “possible” they would NOT certify aircraft with laser cut parts, especially if they are hidden from visual inspection. In other words the FAA will not grant an Airworthiness certificate for my Van’s aircraft - meaning it becomes a 1400 pound 300 thousand dollar paper weight.
- On one hand Van’s is saying laser cut parts are A-Ok. On the other hand they have terminated all manufacturer of laser cut parts, have ordered laser cut parts replacement, whilst at the same time warning they could cause failure in flight - a.k.a death to pilot and passengers.
- A QuickBuild kit is different from claimants who received parts separated (slow build). For the latter, a case could be made to swap out the parts as adequate measure to recompense and mitigate risk. However for the former, a QB kit, removing and replacing parts is not only difficult but most likely impossible even with very skilled builders. With no directions you might cause unknown damage to aircraft during rebuild. And where the rubber meets the runway - I didn’t pay to unbuild and rebuild an aircraft (which isn’t even feasible)- I paid for a built aircraft with punched parts.
- There is also the glaring and obvious: Van’s knew what they were doing when they shipped these bogus parts off to us. Vans knew a bankruptcy was inevitable. Vans knew the parts embedded in the QB kits were unsafe, unfixable and unproven. Vans commissioned testing of the parts is inconclusive and clearly states laser cut parts are inferior to punched parts.
- I have 34 years of total experience in the aviation industry. As an Aircraft mechanic in the military, working on heavies. And for the past 27 years as an Airline pilot for a major airline. I have three college degrees, all pertain to the aviation world. In aviation, our “rule of law” is written in blood. From our checklist to our regulations and policies, someone was hurt or killed for them to be enacted. These are unproven parts that all aircraft manufacturers have refused to use, including Van’s aircraft. My intention was to fly this aircraft both in the Aerobatic envelope and Utility envelope. I’m not going to die because Van’s Aircraft is attempting to escape the responsibility of tomorrow by evading it today.

Honorable Judge:

I respectfully ask the court to take an in person look at both RV-14 Fuselage and wing QuickBuild kits. After inspecting these two kits, identify all the parts that need to be removed and replaced. Also, learn how to rivet using different techniques and how to also remove those rivets. During this process you will quickly see how the absurdity of Van’s Aircraft “program” to replace parts for the QB kits. There are a but a few people on this planet that have the time and skill to Remove and Replace these parts on a QB kit. Other people are willing to accept large and unnecessary risks and will fly this plane with laser cut parts. Those people are not me.

In 2021 I purchased 2 RV -14 QB kits with punched parts. In 2023 I received 2 QB kits with laser cut parts. Van's promised to return my money to make things right. I did not file suit against Van's aircraft in 2023 because of this promise. Van's QB laser cut aircraft kits are potentially uncertifiable, deadly to fly and impossible to fix. Today I ask the court to reinstate my claim.

I ALSO WAS NOT NOTIFIED OF OBJECTION TO MY CLAIM UNTIL AFTER THE DEADLINE. I RECEIVED A EMAIL ON AUG. 16 2024 - 2 DAYS PAST THE DEADLINE. I am unlearned in court deadlines. I ask the court to consider this matter as it pertains to my claim.

Note: I am unavailable on Sept. 10, 2024. I work as an airline pilot and also have the commitments of a single Father. I commute to Chicago for work and live in Minneapolis to further complicate things. I will do everything possible to make myself available to the court, if need be. I respectfully seek the court consideration, to the aforementioned regard.

CERTIFICATE OF SERVICE

I, Matthew Larson, hereby certify that on September 1, 2024. I served a copy of this CREDITOR'S RESPONSE TO DEBOTR'S CLAIM OBJECTION to the following.

1. Via email to:

Ava Schosen at ava.schoen@tonkon.com

Spencer Fisher at spencer.fisher@tonkon.com

Tim Conway at tim.conway@tonkon.com

2. Via FedEx overnight delivery to:

Tonkon Torp LLP

ATTN: Ava Schoen

888 SW Fifth Ave

STE: 1600

Portland, OR 97204

and

Clerk US Bankruptcy Court District of Oregon

405 E 8th Ave #2600

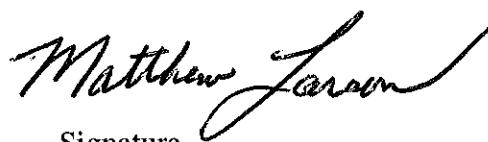
Eugene, OR 97401

Matthew Larson

5028 Zenith Ave S

Minneapolis, MN 55410

612.750.3789



Signature

Part # 156297-10659R0B1 EXP 08/28

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5028 ZENITH AVE S
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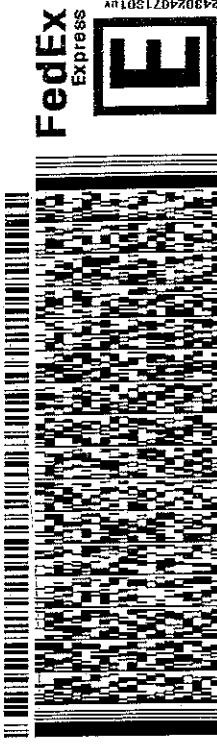
BILL CREDIT CARD

TO US BANKRUPTCY COURT
DISTRICT OF OREGON ATTN: CLERK
405 E 8TH AVE STE 2600

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REF: 11-1421

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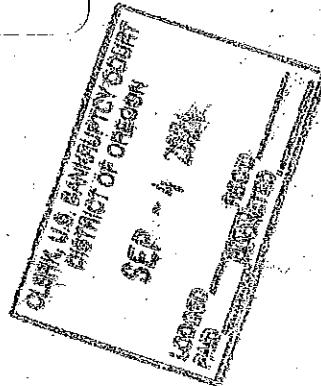


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